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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR-21-00429 YGR
)	[FILED NOVEMBER 2, 2021]
Plaintiff,)	
)	
v.)	
)	
RAY J. GARCIA ,)	
)	
Defendant.)	

UNITED STATES OF AMERICA,)	NO. CR-22-00031 YGR
)	
Plaintiff,)	[FILED JANUARY 28, 2022]
)	
v.)	NOTICE OF RELATED CASE IN A CRIMINAL
)	ACTION
ROSS KLINGER,)	
)	
Defendant.)	

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 JOHN RUSSELL BELLHOUSE,

5 Defendant.

) NO. CR-22-00066-YGR

) [FILED FEBRUARY 17, 2022]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 ENRIQUE CHAVEZ,

11 Defendant.

) NO. CR-22-00104-YGR

) [FILED MARCH 10, 2022]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DARRELL WAYNE SMITH,

17 a/k/a "Dirty Dick Smith,"

18 Defendant.

) NO. CR-23-0110-AMO

) [FILED APRIL 13, 2023, 2022]

) NOTICE OF RELATED CASE IN A CRIMINAL
) ACTION

19
20 Pursuant to Local Criminal Rule 8-1, the United States of America hereby notifies the Court that
21 the five above-captioned criminal cases are related. In CR-21-00429, Ray J. GARCIA is charged with
22 three counts of sexual abuse of a ward in violation of 18 U.S.C. § 2243(b), four counts of abusive sexual
23 contact in violation of 18 U.S.C. § 2244(a)(4), and one count of making a false statement to a
24 government agency in violation of 18 U.S.C. § 1001(a)(2). The conduct occurred in 2019 and 2020
25 while GARCIA was the associate warden at BOP Federal Correctional Institute in Dublin (hereafter
26 "FCI Dublin"). In CR-22-00031, Ross KLINGER is charged with three counts of sexual abuse of a
27 ward in violation of 18 U.S.C. § 2243(b). The conduct occurred in 2020 while KLINGER was a
28 correctional officer at FCI Dublin, and GARCIA was the associate warden. In CR-22-00066, John

Russell BELLHOUSE is charged with two counts of sexual abuse of ward in violation of 18 U.S.C. § 2243(b) and four counts of abusive sexual contact in violation of 18 U.S.C. § 2244(a)(4). The conduct occurred in 2020, while BELLHOUSE was KLINGER's supervisor on the Safety & Recycling crew at FCI Dublin, and while GARCIA was the associate warden. In CR-22-00104, Enrique CHAVEZ is charged with two counts of abusive sexual contact in violation of 18 U.S.C. § 2244(a)(4). The conduct occurred in 2020 while CHAVEZ was a correctional officer at FCI Dublin, and GARCIA was the associate warden. In CR-23-0110, Darrell Wayne SMITH is charged with five counts of sexual abuse of a ward in violation of 18 U.S.C. § 2243(b), six counts of abusive sexual contact in violation of 18 U.S.C. § 2244(a)(3), and one count of aggravated sexual abuse in violation of 18 U.S.C. § 2241(a). The conduct occurred in between May 2019 and May 2021 while SMITH was a correctional officer at BOP Federal Correctional Institute in Dublin (hereafter "FCI Dublin"), and GARCIA was the associate warden. Thus, all five cases involve sexual abuse of a ward at FCI Dublin during the same timeframe. Moreover, GARCIA supervised KLINGER, BELLHOUSE, CHAVEZ, and SMITH during the timeframe of the abuse.

The government anticipates that there will be overlap in the evidence that the government produces in these cases. All five cases arose from an investigation into FCI Dublin during the same timeframe, and many of the interviews conducted by the government, as well as other evidence, pertain to all three cases. Based upon these facts, the cases are related within the meaning of Local Criminal Rule 8-1(b)(2) because these actions appear likely to entail substantial duplication of labor if heard by different Judges or might create conflicts and unnecessary expenses if conducted before different Judges.

Pursuant to Local Criminal Rule 8-1(c)(4), government counsel states that assignment of these cases to a single judge is likely to conserve judicial resources and promote an efficient determination of each action.

DATED: May 11, 2023

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Molly Friedeman
MOLLY PRIEDEMAN
Assistant United States Attorney